# Utah Division of Solid & Hazardous Waste Incident Summary of Thermo Fluids PCB Contamination Inspection August 22, 2014

Date	Records	Event Narrative
08/20/2014	Bill of Lading #2623526  JBT Aerotech	Thermo Fluids driver, Steve Simco, collected 350 gallons of used oil from JBT Aerotech in Ogden, Utah in truck # OCT123, which later was determined to be contaminated with PCBs.
08/20/2014	Tank # 20 Log	Steve Simco, pumped 5,010 gallons of used oil into Tank # 20 using truck # OCT 123 on August 20, 2014. This used oil load was later determined to be contaminated with PCBs.
08/20/2014	1.Chain of Custody Record 2.Tank # 20 log record	Facility Operations Manager, Robert Vaughn, locked down Tank # 20 after collecting a sample for analysis. The tank has a capacity of 20,000 gallons. Mr. Darren Myers stated to the inspector that the facility usually does not fill the tanks, as they need tested oil on a quicker turnaround time to sale to their customers, and so they often do not wait until the tank is full to test. The tank contained 9,929 gallons of used oil when it was locked down after the sample was collected. Robert Vaughn FED EXed the sample collected from Tank # 20 to Precision Petroleum Labs, Inc.; on August 21, 2014- FEDEX tracking # 770882234994.
08/21/2014	1.Tank # 17 log record 2.Chain of Custody Record Sample collection Tank # 20	Driver, Steve Simco, collected used oil with truck # OCT 123 on August 21, 2014. He pumped 4,365 gallons of collected used oil from his truck into Tank # 17 on August 21, 2014. Tank # 17 had a total of 9,644 gallons of used oil as of August 21, 2014 that still had PCB contamination from truck # OCT123. Tank # 17 was locked down at 4:00 pm on August 21, 2014 and a sample was sent for analysis.
08/22/2014	No truck collection	Driver, Steve Simco, had the day off August 22, 2014 and no oil was collected in truck OCT123.
08/22/2014	1.Precision Petroleum Labs Analytical for Tank # 20 2. Email to Darren Myers, Robert Vaughn, with analytical data for Tank # 20 ( 11:16 am on Friday August 22, 2014)	Precision Petroleum Labs emailed to Darren Meyers, Robert Vaught and Leonard Marr of Thermo Fluids at 11:16 am on August 22, 2014 analytical results documenting that Tank #20 had PCB contamination. Darrin Myers indicated he was on vacation and did not get back to the office until August 26, 2014.  The facility had analytical data showing PCB contamination in locked down tank # 20. By transferring PCB contaminated used oil into tank #17 from truck #OCT123, the facility should have determined both tanks were now contaminated with PCBs. Furthermore, due to ThermoFluids operation errors, PCB contaminated oil was transferred to the tank piping system, Tank #18, and Tank #26.
08/23 and 08/24, 2014	Facility was closed on the 23 <sup>rd</sup> and 24 <sup>th</sup> and facility did not collect any used oil.	The facility is closed on the weekends. Tanks #20 and #17 held a total of 19,573 gallons of PCB contaminated used oil as of August 22, 2014. Both tanks were locked down for analytical results/review. Tank #17 results were reported to Thermo Fluids unknown date of receipt.

# Utah Division of Solid & Hazardous Waste Incident Summary of Thermo Fluids PCB Contamination Inspection August 22, 2014

Date	Records	Event Narrative
08/25/2014	<ol> <li>Driver BOLs for used oil collected on 08/25/2014</li> <li>Tank # 18 log records</li> <li>Analytical Data Tank # 18 Collected August, 18, 2014 Analytical Data # 18 retest retain sample.</li> </ol>	Driver, Steve Simco, collected used oil on Monday, 8/25/2014 with the PCB contaminated truck # OCT123. The used oil from the contaminated PCB truck #OCT123, was pumped into tank # 18 on 08/25/2014. Mr. Darren Myers told the inspector he asked the laboratory to retest the used oil sample pulled from Tank #18 by Robert Vaughn on August 18, 2014, before the PCB contaminated oil was pumped into it on August 25, 2014. The Precision laboratory invoice # 61979 has results for Tank # 18, but the invoice has the sample collected on August 21, 2014. Darren Myers states that it is a paperwork mistake. He indicated he requested the laboratory to retest the sample; there is not a chain of custody for this sample.
8/25/2014	Tank #26 log record	Operations manager, Robert Vaughn, transferred the used oil from locked down tanks # 20 and #17 to Tank # 26 on August 25, 2014. The PCB contaminated used oil was transferred through the piping system into tank # 26. Tank # 26 contained 52,179 gallons of used oil on 8/22/2014 before the transfer of PCB contaminated oil on August 25, 2014.  The facility transferred 9,425 gallons of used oil from truck OCT88 to Tank # 26 that was on-
		specification used oil from Thermo Fluids Beowanwe facility in Nevada on August 25, 2014. Robert Vaughn loaded PCB contaminated used oil from Tank #26 into truck OCT134 on August 25, 2014 for delivery to a client in Beaver, Utah.
8/26/2014	Facility Records	Mr. Darren Meyers returned to the facility on Tuesday and reviewed the analytical data to discover the PCB contamination He called all vehicles back to the facility, and began the investigation. Darren Meyers contacted the driver of truck OCT134, on August 26, 2014 and cancelled the delivery to Beaver, and had the driver return the used oil to the facility. The August 27, 2014 entry on tank # 26 log shows the used oil loaded into truck # OCT134 was returned to tank # 26. Darren Myers wrote the log entry but Darrin Meyers signed Robert Vaughn's initials on the record. Thermo Fluids pulls a retain sample daily from each collection truck and keeps the samples for 60 days. Thermo Fluids collected a used oil sample from the JBT tank on August 27, 2014 and the analytical showed PCB contamination.
		Operations Manager, Robert Vaughn was terminated after this incident. He had been with the company 21 years.

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thorized use, copying or distribution of this information is prohibited.

TANK 20

0415

#### Myers, Darren

From:

Rachel Garcia <rachelppl@att.net>

Sent:

Friday, August 22, 2014 11:16 AM

То:

Myers, Darren; Marr, Leonard; Vaughn, Robert

Subject:

Emailing: 2014-08-745 TFI Saalt Lake RFO 26 20 mg

**Attachments:** 

2014-08-745 TFI Saalt Lake RFO 26 20 mg.pdf

Your message is ready to be sent with the following file or link attachments:

2014-08-745 TFI Saalt Lake RFO 26 20 mg

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

CERTIFICATE OF ANALYSIS

LABORATORY ADDRESS

5915 Star Lane, Houston, TX 77057

Ph. 713-680-9425 Fax: 713-680-9564

Website: precisionlabs.org

Client Name: Thermo Fluids Salt Lake City, UT

Street Address: 3545 W. 500 So

City, State, Zip: Salt Lake City UT 84104

INVOICE No.	61879	DATE RECEIVED	08-21-2014
LAB REFERENCE No.	2014-08-745	DATE/TIME COLLECTED	08-20-2014@4:00pm
AUTHORIZED BY	Robert Vaughn	MATRIX TYPE	Liquid
PRODUCT ID	(RFO 26) 20		

	TEST	REPORTING	TEST
TEST	METHOD	LIMIT	RESULTS
Gravity API @ 60°F	D-287	****	31.4
Flash Point, °F	S.W. 1010	-10°F	> 200
Viscosity CST @ 40°C	D-445	1	53.02
Pour point, °F	D-97	-10°F	< -10
Sulfur, Wt%	D-4294	0.020	0.3000
Ash, Wt%	D-482	0.001	0.709
Total halogen, PPM	S.W. 9077	***	PASS
Total halogen, PPM	S.W. 9075	200	BRL
PCB's, PPM (1016)	S.W. 8082	0.50	21.92
Water by distillation, Vol%	D-95	0.05	2.0
Sediment by extraction, Wt%	D-473	0.01	0.16
Heat of combustion, BTU/Lb	D-240	2,150	18,971
Heat of combustion, BTU/GAL	D-240	2,150	137,217
Pounds per gallon @ 60°F	All has to come		7.233
Glycols, Wt%	G.C./FID	0.10	0.24

		Preparation	Reporting	
Total Metal	Test Method	Method	Limit, PPM	Test Result
Arsenic	EPA-6010C	EPA-3040	1.00	BRL
Barium	EPA-6010C	EPA-3040	1.00	4.28
Cadmium	EPA-6010C	EPA-3040	1.00	BRL
Chromium	EPA-6010C	EPA-3040	1.00	2.57
Lead	EPA-6010C	EPA-3040	2.00	47.36
Phosphorus	EPA-6010C	EPA-3040	1.00	903.84

Daniel Zabihi

Date: 08-22-2014

QA Manager

PRIMARY ACCREDITATION TCEO, #T104704203-TX ARIZONA LICENSE # AZ0630

QUALIFIERS & ABBREVIATIONS: BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Mutrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance limits. Test deviation applied to Method 8260 (VOCS).

COMMENTS: There were no quality assurance anomalies associated with these tests.

5915 STAR LANE

HOUSTON, TX 7705

PH 713-680-9425 FAX: 713-680-9564 WEBSITE: PRCISIONLABS.ORG

### CHAIN OF CUSTODY

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PROJECT NAME AND LOCA	TION					_					- 1	AE	3OF	TAS	OR												1	1
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SAMPLE DESCRIPTION	DATE	TIME	Gravity API	Flash	Sulfur	Ash	Total	PCB's	Wate	Wate	BTU's	As, C	Visco	Pour	Sedir	8260 H	Metals	Volat	Semi	Pesticid	Total	COD	voa's	FULL	FULL	FREE	COMP	RUSH
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OTHER METALS(PLEASE CIRCLE): AG, AL, BA, BE, B, CA, CO, FE, PB, MG, MN, HG, MO, NI, P, K, SE, SI, NA, TL, SN, TI, V, ZN

9:05 am

### CERTIFICATE OF ANALYSIS

LABORATORY ADDRESS

5915 Star Lane, Houston, TX 77057

Ph. 713-680-9425 Fax: 713-680-9564

Website: precisionlabs.org

Client Name: Thermo Fluids Salt Lake City, UT

Street Address: 3545 W. 500 So

City, State, Zip: Salt Lake City UT 84104

INVOICE No.	61879	DATE RECEIVED	08-22-2014
LAB REFERENCE No.	2014-08-774	DATE/TIME COLLECTED	08-21-2014@4:00pm
AUTHORIZED BY	Robert Vaughn	MATRIX TYPE	Liquid
PRODUCT ID	(RFO 26) 17		

	TEST	REPORTING	TEST
TEST	METHOD	LIMIT	RESULTS
Gravity API @ 60°F	D-287		30.5
Flash Point, °F	S.W. 1010	-10°F	> 200
Viscosity CST @ 40°C	D-445	1	62.69
Pour point, °F	D-97	-10°F	<-10
Sulfur, Wt%	D-4294	0.020	0.3058
Ash, Wt%	D-482	0.001	0.795
Total halogen, PPM	S.W. 9077		PASS
Total halogen, PPM	S.W. 9075	200	BRL
PCB's, PPM	S.W. 8082	0.50	BRL
Water by distillation, Vol%	D-95	0.05	3.0
Sediment by extraction, Wt%	D-473	0.01	0.17
Heat of combustion, BTU/Lb	D-240	2,150	18,846
Heat of combustion, BTU/GAL	D-240	2,150	137,066
Pounds per gallon @ 60°F	****	***	7.273
Glycols, Wt%	G.C./FID	0.10	0.34

		Preparation	Reporting	
Total Metal	Test Method	Method	Limit, PPM	Test Result
Arsenic	EPA-6010C	EPA-3040	1.00	BRL
Barium	EPA-6010C	EPA-3040	1.00	1.74
Cadmium	EPA-6010C	EPA-3040	1.00	BRL
Chromium	EPA-6010C	EPA-3040	1.00	4.46
Lead	EPA-6010C	EPA-3040	2.00	20.44
Phosphorus	EPA-6010C	EPA-3040	1.00	788.28

Daniel Zabihi QA Manager Date: 08-25-2014

PRIMARY ACCREDITATION TCEQ, #T104704203-TX ARIZONA LICENSE # AZ0630

QUALIFIERS & ABBREVIATIONS: BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Matrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance limits. Test deviation applied to Method 8206 (VOCS).

COMMENTS: There were no quality assurance anomalies associated with these tests.

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS, OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT. RESULTS ARE REPORTED ON AN "AS IS" BASIS, UNLESS OTHERWISE NOTED. THE TEST RESULTS RELATE ONLY TO THE SUBMITTED SAMPLE IDENTIFIED ON THIS REPORT. TEST RESULTS MEET ALL REQUIREMENTS OF NELAC FOR TESTS LISTED ON THE LABORATORY'S CURRENT FIELDS OF ACCREDITATION (EPA 1010, 6010, 8082, 8260, and 9075).

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<sup>-</sup>site for 60 days - Use one log sheet per tank.

	Tank#:	17		Lock Down Date:			Location #3	260
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HOUSTON, TX 77057

PH 713-680-9425 FAX: 713-680-9564 WEBSITE: PRCISIONLABS.ORG

### CHAIN OF CUSTODY

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OTHER METALS(PLEASE CIRCLE): AG, AL, BA, BE, B, CA, CO, FE, PB, MG, MN, HG, MO, NI, P, K, SE, SI, NA, TL, SN, TI, V, ZN

11:00 A~

### FRECISION PERKULEUM LABO, INC.

### CERTIFICATE OF ANALYSIS

LABORATORY ADDRESS 5915 Star Lane, Houston, TX 77057 Ph. 713-680-9425 Fax: 713-680-9564 Website: precisionlabs.org

Client Name: Thermo Fluids Salt Lake City, UT

Street Address; 3545 W. 500 So

City, State, Zip: Salt Lake City UT 84104

INVOICE No.	61879	DATE RECEIVED	08-19-2014
LAB REFERENCE No.	2014-08-651	DATE/TIME COLLECTED	08-18-2014@4:00pm
AUTHORIZED BY	Robert Vaughn	MATRIX TYPE	Liquid
PRODUCT ID	(RFO 26) 17 18		

	TEST		REPORTING	TEST
TEST	<b>METHOD</b>		LIMIT	RESULTS
Gravity API @ 60°F	D-287			29.9
Flash Point, °F	S.W. 1010		-10°F	> 200
Viscosity CST @ 40°C	D-445		1	55.57
Pour point, °F	D-97		-10°F	<-10
Sulfur, Wt%	D-4294		0.020	0.2739
Ash, Wt%	D-482		0.001	0.686
Total halogen, PPM	S.W. 9077	*3		PASS
Total halogen, PPM	S.W. 9075		200	226
PCB's, PPM	S.W. 8082		0.50	BRL
Water by distillation, Vol%	D-95		0.05	5.6
Sediment by extraction, Wt%	D-473		0.01	0.15
Heat of combustion, BTU/Lb	D-240		2,150	18,274
Heat of combustion, BTU/GAL	D-240		2,150	132,669
Pounds per gallon @ 60°F				7.260
Glycols, Wt%	G.C./FID		0.10	0.58

		Preparation	Reporting	
Total Metal	Test Method	Method	Limit, PPM	Test Result
Arsenic	EPA-6010C	EPA-3040	1.00	BRL
Barium	EPA-6010C	EPA-3040	1.00	3.48
Cadmium	EPA-6010C	EPA-3040	1.00	BRL
Chromium	EPA-6010C	EPA-3040	1.00	BRL
Lead	EPA-6010C	EPA-3040	2.00	BRL
Phosphorus	EPA-6010C	EPA-3040	1.00	661.68

Daniel Zabihi QA Manager

Date: 08-20-2014

ARIZONA LICENSE # AZ0630

PRIMARY ACCREDITATION TCEQ, #T104704203

QUALIFIERS & ABBREVIATIONS: BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Matrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance ilmits. Test deviation applied to Method 8260 (VOCS). COMMENTS: There were no quality assurance anomalies associated with these tests.

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS, OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT. RESULTS ARE REPORTED ON AN "AS IS" BASIS, UNLESS OTHERWISE NOTED. THE TEST RESULTS RELATE ONLY TO THE SUBMITTED SAMPLE IDENTIFIED ON THIS REPORT. TEST RESULTS MEET ALL REQUIREMENTS OF NELAC FOR TESTS -site for 60 days - Use one log sheet per tank. 70 œ G Ċī 4 N 8-22-14 2111 112/14 8 20 12 7704/52/6770 H218081114 26233324 ROBERY VAUGHO .22X 100 200 336 0000 45/5 " 43800 9736 4596 4249 889 DE A STARTING GALLONS 41 69433 74200 260

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FU2213 8-20-14 11-92-8 9814 8-22-14 8-20-14 8-25-14 8-25-14 8-20-14 47-25-14 822-14 8-23-14 11-61-8 h1-02.8 M1-78-8 といれたいろ Time が報 5245 3146 9375 9375 4006 **h**S\$S 3046 4052 Gallons SALJET. 684. IN 14310 2768 9115 \$ 9.8 04.06 3228 942S ,0686) 7420 9375 Guage FO 26 OPERATIONS TANK 9417 Breto 24.86 sant. TOSO, 4585 23 7 25 79355 2998A 37767 195.82 de 1119m 72.967 59046 22 Sains 70 Gada RUCCT 134- Cancelled Low clud-/120 IP CUT 88 (26236 35) Thurster For Browne RV MANG FERFRAM 20: RY TRANSFERMON & 40 MYAANDE ARROW 12 104 134 C7623824) Who Sportson or TRANSFER HAMA 17 160 124 (26238 CE) Mich 20 00 ME ( 1300) MANY FOR STOM YA · GC+ 8\$ (2623584) C/y de - 13emer OCTES - Truster From Drowne TRANTECHTION 8 OLF 88 (2623682) Clyde - Brime MAJETINION MIKE CORCEONE 1 121470 Marsher from 18 - DCBOI 11 34 ( 2236 81 ) MR Mueto 2623680 Injetion astron

### CERTIFICATE OF ANALYSIS

LABORATORY ADDRESS

5915 Star Lane, Houston, TX 77057

Ph. 713-680-9425 Fax: 713-680-9564

Website: precisionlabs.org

Client Name: Thermo Fluids Salt Lake City, UT

Street Address: 3545 W. 500 So

City, State, Zip: Salt Lake City UT 84104

INVOICE No.	61879	DATE RECEIVED	08-26-2014
LAB REFERENCE No.	2014-08-850	DATE/TIME COLLECTED	08-21-2014@4:00pm
AUTHORIZED BY	Robert Vaughn	MATRIX TYPE	Liquid
PRODUCT ID	(RFO 26) 18	`	

	TEST	REPORTING	TEST
TEST	METHOD	LIMIT	RESULTS
Gravity API @ 60°F	D-287		28.1
Flash Point, °F	S.W. 1010	-10°F	> 200
Viscosity CST @ 40°C	D-445	1 =	59.84
Pour point, °F	D-97	-10°F	< -10
Sulfur, Wt%	D-4294	0.020	0.2343
Ash, Wt%	D-482	0.001	0.737
Total halogen, PPM	S.W. 9077		PASS
Total halogen, PPM	S.W. 9075	200	407
PCB's, PPM	S.W. 8082	0.50	BRL
Water by distillation, Vol%	D-95	0.05	10.4
Sediment by extraction, Wt%	D-473	0.01	0.16
Heat of combustion, BTU/Lb	D-240	2,150	17,328
Heat of combustion, BTU/GAL	D-240	2,150	127,932
Pounds per gallon @ 60°F			7.383
Glycols, Wt%	G.C./FID	0.10	1.99

		Preparation	Reporting	
Total Metal	Test Method	Method	Limit, PPM	Test Result
Arsenic	EPA-6010C	EPA-3040	1.00	BRL
Barium	EPA-6010C	EPA-3040	1.00	7.25
Cadmium	EPA-6010C	EPA-3040	1.00	BRL
Chromium	EPA-6010C	EPA-3040	1.00	2.34
Lead	EPA-6010C	EPA-3040	2.00	2.37
Phosphorus	EPA-6010C	EPA-3040	1.00	660.01

Daniel Zabihi QA Manager Date: 08-27-2014

PRIMARY ACCREDITATION TCEQ, #T104704203-TX ARIZONA LICENSE # AZ0630

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COMMENTS: There were no quality assurance anomalies associated with these tests

PRECISION PETROLEUM LABS, INC.'S RESPONSIBILITY FOR THE ABOVE ANALYSIS, OPINIONS OR INTERPRETATIONS IS LIMITED TO THE INVOICE AMOUNT. RESULTS ARE REPORTED ON AN "AS IS" BASIS, UNLESS OTHERWISE NOTED. THE TEST RESULTS RELATE ONLY TO THE SUBMITTED SAMPLE IDENTIFIED ON THIS REPORT. TEST RESULTS MEET ALL REQUIREMENTS OF NELAC FOR TESTS LISTED ON THE LABORATORY'S CURRENT FIELDS OF ACCREDITATION (EPA 1010, 6010, 8082, 8260, and 9075).

### CERTIFICATE OF ANALYSIS

LABORATORY ADDRESS

5915 Star Lane, Houston, TX 77057

Ph. 713-680-9425 Fax: 713-680-9564

Website: precisionlabs.org

Client Name: Thermo Fluids Salt Lake City, UT

Street Address: 3545 W. 500 So

City, State, Zip: Salt Lake City UT 84104

INVOICE No.	61879	DATE RECEIVED	08-28-2014
LAB REFERENCE No.	2014-08-941	DATE/TIME COLLECTED	08-27-2014@1:45PM
AUTHORIZED BY	Darren Myers	MATRIX TYPE	Liquid
PRODUCT ID	JBT AEROTECH / OGDEN		

	TEST	REPORTING	TEST
TEST	<b>METHOD</b>	LIMIT	RESULTS
PCB's, PPM(Dry Basis) (1016)	S.W. 8082	0.50	547.79
PCB's, PPM (Wet Basis) (1016)	S.W. 8082	0.50	49.39

Daniel Zabihi QA Manager

Date: 08-28-2014

PRIMARY ACCREDITATION TCEQ, #T104704203-TX ARIZONA LICENSE # AZ0630

QUALIFIERS & ABBREVIATIONS; BRL - Below Reporting Limit; SCL - Test performed by an approved subcontract laboratory; B - Analyte was detected in the associated method blank; Matrix spike/matrix spike duplicate (M), Laboratory control sample (L), Calibration criteria (C), and Surrogate (S) recoveries were outside acceptance limits. Test deviation applied to Method 8260 (VOCS).

COMMENTS: There were no quality assurance anomalies associated with these tests.

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TANK 18